

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:  
ANDREW WILLIAM PULSNEY,  
ERIN MARIE PULSNEY,  
**DEBTOR(S).**

ANDREW WILLIAM PULSNEY,  
ERIN MARIE PULSNEY,  
**MOVANT(S),**

v.

NATIONSTAR MORTGAGE LLC,  
**RESPONDENT,**

and

RONDA J. WINNECOUR,  
CHAPTER 13 TRUSTEE,  
**ADDITIONAL RESPONDENT.**

Bankruptcy No. 23-70024-JAD

Chapter 13

Document No.

Related to Claim No. 5

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE PURSUANT  
TO W.PA.LBR 3002-4 (b)(2)**

AND NOW, come the debtors, Andrew William Pulsney and Erin Marie Pulsney, by and through their attorney, Daniel J. Boger, Esq. and the law firm of Harold Shepley & Associates, LLC, and respectfully file the within Declaration Regarding Notice of Mortgage Payment Change and, in support thereof, represent as follows:

1. The debtors are Andrew William Pulsney and Erin Marie Pulsney, both adult individuals presently residing at 584 Kuhn Lane, Duncansville, PA 16635.
2. Counsel for the debtor is Daniel J. Boger, Esq., of Harold Shepley & Associates LLC, 209 West Patriot Street, Somerset, Pennsylvania 15501.
3. The mortgage company for the debtors' residential real estate is Nationstar Mortgage LLC, Attn: Bankruptcy Department, P.O. Box 619096, Dallas, TX 75261-9741 as indicated on the proof of claim and filed at Claim No. 5 in the Claims Register in this case.

4. The new post-petition monthly payment payable to Nationstar Mortgage LLC is \$1,071.79 effective February 1, 2024, as indicated in the Notice of Mortgage Payment Change filed on January 9, 2024, at Claim No. 5 in the Claims Register in this case.

5. Debtor's counsel has reviewed the current Plan dated January 17, 2023, and the subsequent Confirmation Orders adjusting the Plan term, recomputed the Plan payment based upon the mortgage payment change, and believes that the existing Chapter 13 Plan payment is sufficient to fund the Plan.

Date: 12/30/2024

Respectfully submitted,  
/s/ Daniel J. Boger, Esq.  
Daniel J. Boger, Esq.  
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